

# **Exhibit 3**

## Seguin, Paula

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**From:** Dan Chiorean <dchiorean@odrlaw.com>  
**Sent:** Monday, July 22, 2019 11:35 AM  
**To:** Glynn, Katie  
**Cc:** Blad, Leiv; Jaramillo, Zarema; 'Daniel Litvin (dlitvin@garwingerstein.com)'; 'van der Meulen, Robin'; 'Deborah Elman'; Chris Letter; 'Kristyn Fields'; 'David Raphael'; 'Kelly Tucker'  
**Subject:** RE: In re Novartis and Par Antitrust Litig. (S.D.N.Y.)

Katie,

Regarding Lupin:

As I mentioned in my July 1 email correspondence, Lupin's April 26 production of documents responsive to Request No. 3 is deficient. When can we expect to receive Lupin's complete regulatory correspondence for ANDA No. 090245? Secondly, summer schedules notwithstanding, Lupin has been in possession of Plaintiffs' subpoena for over eight months, and we have had agreement over the scope of Lupin's production for more than three months. A delay in production this long is simply unacceptable. Plaintiffs request that Lupin complete the entirety of its agreed-upon production by August 5, 2019, or we will be forced to seek redress from the court.

Regarding Novel:

Plaintiffs' position regarding the production of Novel's documents is the same. Novel has been in possession of Plaintiffs' subpoena for over seven months now. That should be sufficient time to locate and produce documents prior to (and, where relevant, after) the acquisition of Novel by Lupin. Plaintiffs request that Novel complete the entirety of its production by August 5, 2019, or we will need to seek redress from the Court.

Thanks,  
Dan

**Dan Chiorean**  
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New Orleans, LA 70130  
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**From:** Glynn, Katie <KGlynn@lowenstein.com>  
**Sent:** Tuesday, July 16, 2019 3:41 PM  
**To:** Dan Chiorean <dchiorean@odrlaw.com>  
**Cc:** Blad, Leiv <LBlad@lowenstein.com>; Jaramillo, Zarema <ZJaramillo@lowenstein.com>; 'Daniel Litvin (dlitvin@garwingerstein.com)' <dlitvin@garwingerstein.com>; 'van der Meulen, Robin' <rvandermeulen@labaton.com>; 'Deborah Elman' <delman@gelaw.com>; Chris Letter <cletter@odrlaw.com>; 'Kristyn Fields' <kfields@faruqilaw.com>; 'David Raphael' <draphael@ssrllp.com>; 'Kelly Tucker' <ktucker@gelaw.com>  
**Subject:** RE: In re Novartis and Par Antitrust Litig. (S.D.N.Y.)

Dan,

We are continuing to work to collect, review, and produce this information. Given summer schedules, this is taking longer than expected. We hope to have the additional documents produced to you this month.

Thanks,  
Katie

**Katie R. Glynn**  
Associate  
Lowenstein Sandler LLP

T: 202.753.3824  
F: 202.753.3838

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**From:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>  
**Sent:** Thursday, July 11, 2019 10:42 PM  
**To:** Glynn, Katie <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>  
**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Jaramillo, Zarema <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)> <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>; 'David Raphael' <[draphael@ssrllp.com](mailto:draphael@ssrllp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; 'Morrison, Brian' <[bmorrison@labaton.com](mailto:bmorrison@labaton.com)>  
**Subject:** RE: In re Novartis and Par Antitrust Litig. (S.D.N.Y.)

Katie,

I'm following up on my email below.

In addition, you stated in your 6/21/2019 email that "Lupin's supplemental productions will be made over the next couple weeks." When can Plaintiffs expect to receive the remainder of Lupin's production?

Thanks,  
Dan

**Dan Chiorean**  
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**From:** Dan Chiorean  
**Sent:** Thursday, June 27, 2019 9:51 AM  
**To:** Glynn, Katie <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>  
**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Jaramillo, Zarema <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)> <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>;

'David Raphael' <[draphael@ssrllp.com](mailto:draphael@ssrllp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; 'Morrison, Brian' <[bmorrison@labaton.com](mailto:bmorrison@labaton.com)>

**Subject:** RE: In re Novartis and Par Antitrust Litig. (S.D.N.Y.)

Katie,  
We are in receipt of Novel's current production.

Is Novel agreeing to produce the same categories of documents responsive to Plaintiffs' subpoena that Lupin agreed to produce?

Thanks,  
Dan

**Dan Chiorean**

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**From:** Glynn, Katie <[KGlynn@lowenstein.com](mailto:KGlynn@lowenstein.com)>

**Sent:** Wednesday, June 26, 2019 2:29 PM

**To:** Dan Chiorean <[dchiorean@odrlaw.com](mailto:dchiorean@odrlaw.com)>

**Cc:** Blad, Leiv <[LBlad@lowenstein.com](mailto:LBlad@lowenstein.com)>; Jaramillo, Zarema <[ZJaramillo@lowenstein.com](mailto:ZJaramillo@lowenstein.com)>; 'Daniel Litvin' <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)> <[dlitvin@garwingerstein.com](mailto:dlitvin@garwingerstein.com)>; 'van der Meulen, Robin' <[rvandermeulen@labaton.com](mailto:rvandermeulen@labaton.com)>; 'Deborah Elman' <[delman@gelaw.com](mailto:delman@gelaw.com)>; Chris Letter <[cletter@odrlaw.com](mailto:cletter@odrlaw.com)>; 'Kristyn Fields' <[kfields@faruqilaw.com](mailto:kfields@faruqilaw.com)>; 'David Raphael' <[draphael@ssrllp.com](mailto:draphael@ssrllp.com)>; 'Kelly Tucker' <[ktucker@gelaw.com](mailto:ktucker@gelaw.com)>; 'Morrison, Brian' <[bmorrison@labaton.com](mailto:bmorrison@labaton.com)>

**Subject:** In re Novartis and Par Antitrust Litig. (S.D.N.Y.)

Counsel,

Please see the attached correspondence. The referenced Sharefile link is below, and the password will be sent separately.

<https://lowensteinsandler.sharefile.com/d-s1cef8ed2aae48138>

Thanks,  
Katie

**Katie R. Glynn**

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